

# **EXHIBIT L**

to

PLAINTIFF'S OPPOSITION TO  
THE UVA DEFENDANTS' MOTION FOR PROTECTIVE ORDER

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**KIERAN RAVI BHATTACHARYA,**

**Plaintiff,**

**V.**

**JAMES B. MURRAY, JR., *et al.*,**

## Defendants

**Civil Action No.: 3:19-CV-00054-NKM-JCH**

## **DEFENDANTS' AMENDED AND SUPPLEMENTAL INITIAL DISCLOSURES**

Defendants, by counsel, and in accordance with Federal Rule of Civil Procedure 26(a)(1)(A) and (e) amend and supplement their Initial Disclosures as follows. Defendants make these initial disclosures based on information now reasonably available to them and reserve the right to further amend, modify, or supplement these disclosures as discovery in this case progresses.

**I. Rule 26(a)(1)(A)(i):** The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

**Amended and Supplemental Response:** In addition to the individuals identified below, the Defendants reserve the right to rely on and identify as individuals likely to have discoverable information, everyone listed in the Plaintiff's Initial Disclosures and all individuals listed or identified in discovery and/or in the documents identified herein. By identifying the individuals

in this response, the Defendants do not represent or concede that any of the information possessed by such individuals is relevant or admissible. Discovery will be commenced and continuing, and the Defendants reserve the right to revise or supplement this response.

Name	Address and Telephone Number	Subjects of Information
Kieran Bhattacharya (The Plaintiff)	Mr. Bhattacharya may be contacted through his counsel at Foley & Lardner, LLP.	The Plaintiff has information about the allegations in the Amended Complaint and his inappropriate, aggressive, and unprofessional behavior directed towards members of the University of Virginia (“UVA”) community in 2018, his online comments about UVA and UVA faculty following his 2018 suspension, his history of mental health issues including numerous psychiatric hospitalizations, his failure to properly treat his mental illness, and numerous instances of concerning behavior prior to matriculating at UVA including in high school and college.
Christine Peterson, M.D.	Dr. Peterson may be contacted through the undersigned counsel for Defendants.	Dr. Peterson has knowledge of the School of Medicine’s professionalism standards, professional requirements for medical practice, the October 25, 2018 microaggression panel discussion, student complaints about the Plaintiff’s behavior during that panel discussion, Dr. Kern’s professionalism concern card, the November 14 and 28, 2018 ASAC Meetings, interactions between the Plaintiff and Angel Hsu including their relationship history, the Plaintiff’s mental health issues, and the Plaintiff’s

Name	Address and Telephone Number	Subjects of Information
		aggressive, threatening, and intimidating behavior toward Dr. Hsu and Dr. Hsu's efforts to protect herself from the Plaintiff, the Plaintiff's difficulties managing his medication in the fall of 2018, a meeting with the Plaintiff in October 2018.
John Densmore, M.D., PhD	Dr. Densmore may be contacted through the undersigned counsel for Defendants.	Dr. Densmore has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, the November 14 and 28, 2018 ASAC Meetings, the Plaintiff's 2017 psychiatric hospitalization at the UVA Medical Center, and personally witnessed multiple instances of the Plaintiff's inappropriate, aggressive, and unprofessional behavior in 2018.
Jim Tucker, M.D.	Dr. Tucker may be contacted through the undersigned counsel for Defendants.	Dr. Tucker has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.
Nora Kern, M.D.	Dr. Kern may be contacted through the undersigned counsel for Defendants.	Dr. Kern has knowledge of the October 25, 2018 microaggression panel discussion, the resulting concern card, the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.

Name	Address and Telephone Number	Subjects of Information
Sara Rasmussen, M.D.	<p>Dr. Rasmussen may be contacted through her counsel:</p> <p>H. Robert Yates, III O'Hagan Meyer 411 E. Franklin, Suite 500 Richmond, VA 23219 (804) 403-7108</p>	Dr. Rasmussen has knowledge of the events that transpired at the October 25, 2018 microaggression panel discussion.
Melissa Fielding	Deputy Chief Fielding may be contacted through the undersigned counsel for Defendants.	Deputy Chief Fielding has knowledge of the Plaintiff's ban from UVA grounds.
Edward Markowski	Mr. Markowski may be contacted through the undersigned counsel for Defendants.	The Director of Threat Assessment at UVA, Mr. Markowski has knowledge of the Threat Assessment Team's deliberations regarding the Plaintiff in November and December 2018, and the grounds for the 'no trespass warning' issued against the Plaintiff.
Roger Abounader, M.D., PhD	Dr. Abounader may be contacted through the undersigned counsel for Defendants.	Dr. Abounader has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 28, 2018 ASAC Meeting.
Brian Behm, M.D.	Dr. Behm may be contacted through the undersigned counsel for Defendants.	Dr. Behm has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.
Robert Bloodgood, M.D.	Dr. Bloodgood may be contacted through the undersigned counsel for Defendants.	Dr. Bloodgood has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the

Name	Address and Telephone Number	Subjects of Information
		November 28, 2018 ASAC Meeting.
Donna Chen, M.D.	Dr. Chen may be contacted through the undersigned counsel for Defendants.	Dr. Chen has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.
Sharon Diamond-Myrsten, M.D.	Dr. Diamond-Myrsten may be contacted through the undersigned counsel for Defendants.	Dr. Diamond-Myrsten has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 28, 2018 ASAC Meeting.
Nicholas Intagliata, M.D.	Dr. Intagliata may be contacted through the undersigned counsel for Defendants.	Dr. Intagliata has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.
Wilson Miller, PhD	Dr. Miller may be contacted through the undersigned counsel for Defendants.	Dr. Miller has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.
Barnett Nathan, M.D.	Dr. Nathan may be contacted through the undersigned counsel for Defendants.	Dr. Nathan has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.

Name	Address and Telephone Number	Subjects of Information
Catherine Shaffrey, M.D.	Dr. Shaffrey may be contacted through the undersigned counsel for Defendants.	Dr. Shaffrey has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings
Mackenzie Sullivan, M.D.	Brigham and Women's Hospital 75 Francis St. Boston, MA 02115	Dr. Sullivan has knowledge of the ASAC's 2018 decisions to admonish and suspend the Plaintiff from the School of Medicine.
Brielle Ochoa (formerly Brielle Gerry), M.D.	Medical Univ. of South Carolina 169 Ashley Avenue, Room 202 Charleston, SC 29425	Dr. Ochoa has knowledge of the Plaintiff's behavior during the October 25, 2018 microaggression panel discussion, the ASAC's 2018 decisions to admonish Plaintiff, and concerns communicated to medical school faculty members about Plaintiff's behavior subsequent to his suspension.
Megan Bray, M.D.	Dr. Bray may be contacted through the undersigned counsel for Defendants.	Dr. Bray has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14 and 28, 2018 ASAC Meetings.
Lesley Thomas	Ms. Thomas may be contacted through the undersigned counsel for Defendants.	Ms. Thomas has knowledge of the School of Medicine's professionalism standards, the November 14 and 28, 2018 ASAC Meetings, and student complaints about the Plaintiff's behavior at the October 25, 2018 panel discussion.

Name	Address and Telephone Number	Subjects of Information
Katherine Yates	Ms. Yates may be contacted through the undersigned counsel for Defendants.	Ms. Yates has knowledge of the ASAC's 2018 decisions to admonish and suspend the Plaintiff from the School of Medicine.
Heather Newcomb	(434) 972-1800 Region Ten Community Services Board 800 Preston Ave. Charlottesville, VA 22903	Ms. Newcomb has knowledge of the Plaintiff's behavior and mental state in November 2018.
Catherine Richard, L.P.C.	435 Merchant Walk Sq. Ste. 300-512 Charlottesville, VA 22902-6514 (434) 204-4265	Ms. Richard has knowledge of the Plaintiff's behavior and mental state on November 14, 2018, when he was involuntarily committed to a hospital for mental health reasons.
Nicole Ruzek	Ms. Ruzek may be contacted through the undersigned counsel for Defendants.	Ms. Ruzek has knowledge of various complaints about the Plaintiff's behavior and mental state in 2018, his psychiatric hospitalizations in 2017 and 2018, the Threat Assessment Team's deliberations regarding the Plaintiff in November and December 2018, and the grounds for the 'no trespass warning' issued against the Plaintiff.
Michael Kalinsky	(434) 972-1800 Region Ten Community Services Board 800 Preston Ave. Charlottesville, VA 22903	Mr. Kalinsky may have knowledge of the Plaintiff's behavior and mental state on November 19, 2018, when was involuntarily committed to a hospital for mental health reasons.
Hannah Tribble	(434) 972-1800 Region Ten Community Services Board	Ms. Tribble may have knowledge of the Plaintiff's behavior and mental state on November 19, 2018 when he



Name	Address and Telephone Number	Subjects of Information
	800 Preston Ave. Charlottesville, VA 22903	was involuntarily committed to a hospital for mental health reasons.
Randy Canterbury, M.D.	Dr. Canterbury may be contacted through the undersigned counsel for Defendants.	Dr. Canterbury has knowledge of the School of Medicine's professionalism standards and the requirement that the Plaintiff seek counseling and obtain medical clearance before returning to class in November 2018. He also has knowledge of complaints about the Plaintiff's behavior in 2018 and limited knowledge of the Plaintiff's hospitalizations.
Angel Hsu, M.D.	Defense counsel will provide Dr. Hsu's contact information as <b>Exhibit A</b> to these Initial Disclosures once the parties have a protective order in place prohibiting the disclosure of this information to the Plaintiff.	Dr. Hsu has knowledge of the Plaintiff's aggressive, abusive, unprofessional, and inappropriate behavior in 2017, 2018, and 2019.
Laurie Casteen	Ms. Casteen may be contacted through the undersigned counsel for Defendants.	Ms. Casteen has knowledge related to the Plaintiff's ban from UVA grounds.
Chris Easton	Captain Easton may be contacted through the undersigned counsel for Defendants.	Captain Easton may have knowledge of the Plaintiff's behavior on November 19, 2018 in the context of an emergency custody order and 911 call to which Captain Easton responded and of which the Plaintiff was the subject.
Gloria Graham	Margolis Healy Maple Tree Place - Suite #255 121 Connor Way, Williston, VT 05495 866.817.5817	Ms. Graham has knowledge of the Plaintiff's ban from grounds.

Name	Address and Telephone Number	Subjects of Information
Ben Rexrode	Sergeant Rexrode may be contacted through the undersigned counsel for Defendants.	Sergeant Rexrode of the UVA Police Department may have knowledge the Plaintiff's inappropriate, aggressive, and unprofessional behavior and his ban from grounds.
Susan Davis	Ms. Davis may be contacted through the undersigned counsel for Defendants.	Ms. Davis has knowledge related to the Plaintiff's ban from grounds.
Dean Dotts	Albemarle County Police 1600 5th Street, Suite D Charlottesville, VA 22902 434-296-5807	Formerly employed by the UVA Police Department, Officer Dotts may have knowledge of the Plaintiff's behavior on November 14, 2018 when he took the Plaintiff into custody pursuant to an Emergency Custody Order
Tabitha Enoch	Ms. Enoch may be contacted through the undersigned counsel for Defendants.	Ms. Enoch has knowledge related to the Plaintiff's ban from grounds.
Jaileen Grogan	(434) 972-1800 Region Ten Community Services Board 800 Preston Ave. Charlottesville, VA 22903	Ms. Grogan may have knowledge of the Plaintiff's behavior and mental state on November 14, 2018 due to a psychological examination that led her to request a temporary detention order to a Charlottesville magistrate.
Brandon Michael Smoot	Albemarle County Sheriff's Office 411 East High Street Charlottesville, VA 22902 (434) 972-4001	Officer Smoot, who was formerly employed by the UVA Police Department, has knowledge of the Plaintiff's behavior on November 19, 2018 when he responded to a 911 emergency phone call.
Edward Thompson	UVA Police Officer Thompson may be contacted through the undersigned counsel for Defendants.	Officer Thompson may have knowledge of the Plaintiff's behavior on November 14, 2018 when he executed a

Name	Address and Telephone Number	Subjects of Information
		Temporary Detention Order on the Plaintiff. He also has knowledge of the Plaintiff's ban from grounds.
Tommye Sutton	Chief Sutton's address is presently unknown.	Chief Sutton may have knowledge of the Plaintiff's ban from grounds.
Roxanne Bhattacharya, M.D.	70 Hale Pili Way Haiku, HI 96708	Dr. Bhattacharya has knowledge of the Plaintiff's inappropriate and aggressive behavior in 2018.
Pamila Herrington, M.D.	Dr. Herrington may be contacted through her counsel:  Rosalie Fessier TimberlakeSmith PO Box 108 Staunton, VA 24402 (540) 885-1517	Dr. Herrington has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, the November 14, 2018 ASAC meeting, and Mr. Bhattacharya's January 2017 and November 2018 psychiatric hospitalizations
Joanne C. Mendoza, M.D.	Dr. Mendoza may be contacted through the undersigned counsel for Defendants.	Dr. Mendoza has knowledge of Mr. Bhattacharya's demeanor and behavior during his Foundations of Clinical Medicine class during the fall 2018 semester
Yusuf Ali, M.D.	(561) 676-9099 22 S. Greene Street Baltimore, MD 21201	Dr. Ali went to medical school with the Plaintiff and has knowledge of the Plaintiff's behavior during the October 25, 2018 microaggression panel discussion.
John T. Morgan, M.D.	2101 Taubman Center 1500 E. Medical Ctr. Dr. Ann Arbor, MI 48109	Dr. Morgan went to medical school with the Plaintiff and may have knowledge of Mr. Bhattacharya's behavior during the October 25, 2018 microaggression panel discussion and of concerns

Name	Address and Telephone Number	Subjects of Information
		communicated to medical school faculty members about Plaintiff's behavior subsequent to his suspension.
Ian Smith, M.D.	(703) 408-2456 Dr. Smith's address is presently unknown.	Dr. Smith went to medical school with the Plaintiff and has knowledge of the Plaintiff's behavior during the October 25, 2018 microaggression panel discussion.
Olivia Chafitz (formerly Olivia Payne), M.D.	(443) 790-0123 30 Prospect Avenue Hackensack, NJ 07601	Dr. Chafitz went to medical school with the Plaintiff and has knowledge of the Plaintiff's behavior during the October 25, 2018 microaggression panel discussion.
Adriana Lee Irvine, M.D.	Duke University School of Medicine Department of Anesthesiology Durham, NC 27710 (540) 250-7283	Dr. Irvine went to medical school with the Plaintiff and has knowledge of the Plaintiff's behavior during the October 25, 2018 microaggression panel discussion.
Natalie Savini, M.D.	Scripps Green Hospital 10666 N. Torrey Pines Rd. La Jolla, CA 92037 (408) 858-4934	Dr. Savini went to medical school with the Plaintiff and has knowledge of the Plaintiff's behavior during the October 25, 2018 microaggression panel discussion.
Jason Robart, M.D.	Dr. Robart's address is presently unknown	Dr. Robart went to medical school with the Plaintiff and has knowledge of concerns communicated to medical school faculty members about Plaintiff's behavior subsequent to his suspension.
Lindsay N. Carlson, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225	A resident physician at the UVA Medical Center, Dr. Carlson has knowledge of Mr. Bhattacharya's concerning

Name	Address and Telephone Number	Subjects of Information
	Charlottesville, VA 22904 (434) 924-3586	behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.
Katherine Murray, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	A psychiatry resident at UVA Medical Center, Dr. Murray has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization
Courtney Schempp RN	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Nurse Schempp has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.
Margaret K. Sande, M.D., M.S., MSHPEd	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	An emergency medicine physician, Dr. Sande has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.
Patrick Stafford, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	A resident physician at UVA Medical Center, Dr. Stafford has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.
Jordan Rosen, M.D.	Brigham and Women's Hospital Department of Psychiatry 75 Francis Street Boston, MA 02115 (617) 732-5500	Dr. Rosen has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.

Name	Address and Telephone Number	Subjects of Information
Winifred Wolfe, M.D.	<p>Child and Adolescent Psychiatry Fellow at Thomas Jefferson University Hospitals, Philadelphia, PA 833 Chestnut East, Suite 210 Philadelphia, PA 19107 (215) 955-8570</p> <p>UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586</p>	A former psychiatry resident at the UVA School of Medicine, Dr. Wolfe has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.
Asheema Saripalli, M.D.	<p>Aurora Health Care in Wisconsin Medical College of Wisconsin Milwaukee, WI 53201</p> <p>UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586</p>	A former psychiatry resident at the UVA School of Medicine, Dr. Saripalli has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization.
Thomas Ball, M.D.	<p>UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586</p>	A psychiatry fellow at the UVA School of Medicine, Dr. Ball has knowledge of Mr. Bhattacharya's concerning behavior and mental instability in November 2018 during an emergency psychiatric hospitalization
Andy Thomson, M.D.	<p>UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586</p>	A psychiatrist at CAPS, Dr. Thomson has knowledge of the status of the Plaintiff's mental health in early 2017 when he professionally examined and assessed the Plaintiff.
Sean W. Reed, M.D.	Dr. Reed may be contacted through the undersigned counsel for Defendants.	As one of the four School of Medicine college deans, Dr. Reed has knowledge of the November 14, 2018 ASAC

Name	Address and Telephone Number	Subjects of Information
		meeting and may have additional knowledge of Mr. Bhattacharya's concerning behavior at and around that time.
David L. Heilberg	416 Park St. Charlottesville, VA 22902 (434) 284-6866	As Mr. Bhattacharya's former legal counsel, Mr. Heilberg has knowledge of Mr. Bhattacharya's behavior in November and December 2018 and discussions with UVA about Mr. Bhattacharya's suspension and related matters.
Director of Security/Security Staff Sgt. Anthony Frazier	Staff Sgt. Frazier may be contacted through the undersigned counsel for Defendants.	A member of the UVA Police Department, Staff Sgt. Frazier has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in January 2017 and in November 2018.
Michael Gerard Mason, Ph.D	Dr. Reed may be contacted through the undersigned counsel for Defendants.	Dr. Mason has knowledge of the Plaintiff's behavior and mental state on November 14, 2018, when he was involuntarily committed to a hospital for mental health reasons.
Thomas Wilson	Police Officer Wilson may be contacted through the undersigned counsel for Defendants.	A member of the UVA Police Department, Staff Sgt. Frazier has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.
Dreshawn Burton	UVA Security Officer Burton may be contacted through the undersigned counsel for Defendants.	A member of the UVA Police Department, Staff Sgt. Frazier has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.

Name	Address and Telephone Number	Subjects of Information
Craig Leshner	A former Security Officer for UVA, Craig Leshner's contact information is currently unknown.	Former UVA Security Officer Leshner has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.
AmJad Awadh Al srya	Police Officer AmJad Awadh Al srya may be contacted through the undersigned counsel for Defendants.	Officer Al srya has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.
Kelly Robeson	A former Security Officer for UVA, Kelly Robeson's contact information is currently unknown.	Former UVA Security Officer Kelly Robeson has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.
Nicholas Bumgardner	UVA Security Officer Nicholas Bumgardner may be contacted through the undersigned counsel for Defendants.	Security Officer Nicholas has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.
Nikara Feasey	UVA Security Corporal Nikara Feasey may be contacted through the undersigned counsel for Defendants.	Security Corporal Nikara Feasey has knowledge of Mr. Bhattacharya's behavior during his psychiatric hospitalization in November 2018.
Peter Kehr, M.D.	Loma Lunda University Medical Center 11234 Anderson St. Loma Linda, CA 92354 (909) 558-4000	Dr. Kehr has knowledge of Mr. Bhattacharya's concerning behavior and mental instability during Fall 2016 and Spring 2017.
Joshua Ginsburg, M.D.	St. Bernard Parish Hospital 8000 W. Judge Perez Dr. Chalmette, LA 70043 (504) 826-9500	Dr. Ginsburg has knowledge of Mr. Bhattacharya's behavior and mental instability during his psychiatric hospitalization in January 2017.



Name	Address and Telephone Number	Subjects of Information
Debasis Bhattacharya	University of Hawaii Maui College 310 W. Kaahumanu Avenue Kahului, HI 96732 (808) 984-3619	Debasis Bhattacharya has knowledge of Kieran Bhattacharya's behavior and mental instability from Kieran Bhattacharya's birth through the present, including his psychiatric hospitalizations in January 2017 and in November 2018.
Joshua Ryan Smith, M.D.	Vanderbilt University Medical Center 1211 Medical Center Dr. Nashville, TN 37232 (615) 322-5000	Dr. Smith has knowledge of Mr. Bhattacharya's behavior and mental instability during his psychiatric hospitalization in January 2017.
Charles Moseley, M.D.	411 8 <sup>th</sup> St. NE Charlottesville, VA 22902 (434) 979-1902	Dr. Moseley has knowledge of Mr. Bhattacharya's behavior and mental health condition in 2017 and 2018.
Stephanie Coleman	Ms. Coleman's address is currently unknown.	Ms. Coleman has knowledge of Mr. Bhattacharya's behavior and mental instability during his psychiatric hospitalization in January 2017.
Leonard "Lenny" Carter, LPC	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Mr. Carter has knowledge of Mr. Bhattacharya's behavior and mental instability before his psychiatric hospitalization in January 2017.
Justin Smith, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Dr. Smith has knowledge of Mr. Bhattacharya's behavior and mental instability during his psychiatric hospitalization in January 2017.
Matthew Vanden Hoek, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Dr. Hoek has knowledge of Mr. Bhattacharya's behavior and mental instability during his psychiatric hospitalization in January 2017.

Name	Address and Telephone Number	Subjects of Information
Karen Painter, LPC	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Mr. Painter has knowledge of Mr. Bhattacharya's behavior and mental instability before and during his psychiatric hospitalization in January 2017.
Meg Keeley, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	As one of the four School of Medicine college deans, Dr. Keeley has knowledge of the November 14, 2018 ASAC meeting and may have additional knowledge of Mr. Bhattacharya's concerning behavior at and around that time.
Brenda Barrett	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Ms. Barrett has knowledge of Mr. Bhattacharya's behavior and mental instability during his psychiatric hospitalization in November 2018.
Allen Groves	Syracuse University, Chancellor's Office Crouse-Hinds Hall, Suite 600 900 South Crouse Avenue Syracuse, NY 13244 (315) 443-2235	Former Dean Groves may have knowledge the Plaintiff's inappropriate, aggressive, and unprofessional behavior and his ban from grounds.
Elizabeth Bradley, PhD	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Dr. Bradley has knowledge about posts Mr. Bhattacharya made on Twitter and Mr. Bhattacharya's communications with Jason Kessler.
Gabrielle R. Marzani, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Dr. Marzani has knowledge about Kieran Bhattacharya and Debasis Bhattacharya's visit to the School of Medicine's Admissions Office in December 2018.
Catherine Zisk, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225	Dr. Zisk may have knowledge about Mr. Bhattacharya's interaction with UVA 5 East

Name	Address and Telephone Number	Subjects of Information
	Charlottesville, VA 22904 (434) 924-3586	staff during Mr. Bhattacharya's psychiatric hospitalization in January 2017.
Sahitya Allam, M.D.	Dr. Allam's address is presently unknown.	Dr. Allam may have knowledge about Mr. Bhattacharya's psychiatric hospitalization in November 2018.
Donald McGee	Retired Officer McGee's address is presently unknown.	Officer McGee has knowledge about the FOIA request Mr. Bhattacharya sent to the University.
Austin Branstetter	Mr. Branstetter's address is presently unknown.	Mr. Branstetter may have knowledge of Mr. Bhattacharya's no trespass order issued by the Tuscaloosa Police Department.
Mazin Elsarrag	Mr. Elsarrag's address is presently unknown.	Mazin has knowledge of Mr. Bhattacharya's unprofessional behavior, which led to his suspension from the School of Medicine.
Deepti Athalye	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	Associate director at CAPS, Ms. Athalye has knowledge of the Plaintiff's requests to CAPS staff to participate in meetings and Plaintiff's ban from grounds.
Erin Tracy	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	A psychologist at CAPS, Ms. Tracy may have knowledge of Plaintiff's treatment with CAPS and his involuntary commitments in November 2018.
James Moak, M.D.	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904	Dr. Moak has knowledge of the Plaintiff's behavior and mental state on November 14, 2018, when he was involuntarily

Name	Address and Telephone Number	Subjects of Information
	(434) 924-3586	committed to a hospital for mental health reasons.
Kiah Porter	UVA Police Sergeant Porter may be contacted through the undersigned counsel for Defendants.	Sergeant Porter has knowledge of the Plaintiff's ban from grounds.
Michael Henry	UVA Police Property and Evidence Sergeant Henry may be contacted through the undersigned counsel for Defendants.	Sergeant Henry may have knowledge of the Plaintiff's ban from grounds.
Matthew Zimmerman	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	A psychologist at CAPS, Mr. Zimmerman has knowledge of Plaintiff's treatment with CAPS, his involuntary commitments in November 2018, and Plaintiff's ban from grounds.
Rafael Triana	Mr. Triana's address is presently unknown.	A licensed clinical social worker formerly with CAPS, Mr. Triana may have knowledge of Plaintiff's treatment with CAPS and his involuntary commitments in November 2018.
Sarah Cooper	Ms. Cooper's address is presently unknown.	A licensed clinical social worker formerly with CAPS, Ms. Cooper has knowledge of the Plaintiff's interactions with CAPS and Plaintiff's involuntary commitments in November 2018.
Stephen Culp, M.D.	Dr. Culp may be contacted through the undersigned counsel for Defendants.	Dr. Culp has knowledge of the School of Medicine's professionalism standards, professional requirements for medical practice, and the November 14, 2018 ASAC Meeting.

Name	Address and Telephone Number	Subjects of Information
Selina Noramly	Ms. Noramly's address is presently unknown.	Ms. Noramly has knowledge of the School of Medicine's professionalism standards and the November 14, 2018 ASAC Meeting.
Abigail Bradford	Ms. Bradford's address is presently unknown.	Ms. Bradford has knowledge of Mr. Bhattacharya's aggressive behavior and verbal altercation on November 18, 2018, at 820 Cabell Avenue B Charlottesville, Virginia.
Any and all staff at the Poplar Springs Hospital who treated Mr. Bhattacharya in November 2018, as reflected in medical records in Mr. Bhattacharya's possession	Poplar Springs Hospital 350 Poplar Drive Petersburg, VA 23805 (804) 733-6874	The treating staff at Poplar Springs Hospital, including but not limited to therapists, nurses, and physicians, have knowledge of Plaintiff's behavior during his psychiatric hospitalization there in November 2018.
Any and all staff at the UVA Medical who treated Mr. Bhattacharya in November 2018 or January 2017, as reflected in medical records in Mr. Bhattacharya's possession	UVA Office of University Counsel Madison Hall P. O. Box 400225 Charlottesville, VA 22904 (434) 924-3586	The treating staff at the UVA Medical Center, including but not limited to therapists, nurses, and physicians, have knowledge of Plaintiff's behavior during his psychiatric hospitalizations there.

## II. Rule 26(a)(1)(A)(ii)

A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

**Response:** The Defendants object to the production of documents subject to the attorney-client and executive privileges, otherwise protected by work-product doctrine, and/or protected from disclosure by Court seal or other confidentiality. By listing these documents, the Defendants do not concede that any particular document is relevant or admissible. The Defendants object to the production of documents, including but not limited to documents that could compromise an individual's physical safety, absent a protective order. Subject to and without waiving the foregoing objections, the Defendants identify the following classes of documents which may be used to support their defenses:

<b>Category</b>	<b>Location</b>
Plaintiff's medical records	UVA Medical Center
Plaintiff's counseling records	UVA Department of Student Health and Wellness
Plaintiff's student records	UVA School of Medicine
School of Medicine policy and procedure records	UVA School of Medicine
Faculty and administration correspondence	Various UVA School of Medicine faculty and administration email accounts
Police records and correspondence	UVA Police Department
Threat Assessment Team Records, policy, and procedure	UVA Department of Safety and Security
Academic Standards and Achievement Committee Records	UVA School of Medicine
Emails of UVA faculty and administrators	Email inboxes of various faculty and administrators at UVA

In addition to the foregoing, the Defendants reserve the right to rely on and identify any documents listed by the Plaintiff in his Initial Disclosures, and those documents attached to, relied upon, or otherwise referenced in the First Amended Complaint, and any documents identified in discovery.

**III. Rule 26(a)(1)(A)(iii)**

A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

**Response:** At this time, and without waiving the right to do so in the future, the Defendants have not filed any claims against the Plaintiff. Should the Defendants prevail in this action and should the circumstances warrant it, the Defendants specifically reserve their right to seek against the Plaintiff their attorney’s fees and costs, pursuant to Rule 54 of the Federal Rules of Civil Procedure, 42 U.S.C. § 1988, and any other permissible legal avenue of relief.

**IV. Rule 26(a)(1)(A)(iv)**

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**Response:**

The Defendants attach the Commonwealth of Virginia’s “Risk Management Plan” as **Exhibit B**. Please note that the Division of Risk Management is not a “person carrying on an insurance business . . . liable to satisfy part or all of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment” and therefore no “insurance agreement” exists between the Division of Risk Management and the Defendants.

Dated: March 24, 2022

Respectfully submitted,

**McGUIREWOODS LLP**

/s/ Farnaz F. Thompson

Farnaz F. Thompson (VSB No. 75982)  
Brandi G. Howard (admitted *pro hac vice*)  
Michael Brody (admitted *pro hac vice*)  
James Compton (admitted *pro hac vice*)  
888 16th Street N.W. Suite 500  
Black Lives Matter Plaza  
Washington, DC 20006  
Telephone: (202) 857-1700  
Facsimile: (202) 828-3358  
fthompson@mcguirewoods.com  
bhoward@mcguirewoods.com  
mbrody@mcguirewoods.com  
jcompton@mcguirewoods.com

Evan X. Tucker (VSB No. 95042)  
Alicia M. Penn (VSB No. 94937)  
800 East Canal Street  
Richmond, VA 23219  
Telephone: (804) 775-1000  
Facsimile: (804) 775-1061  
etucker@mcguirewoods.com  
apenn@mcguirewoods.com

Jonathan T. Blank (VSB No. 38487)  
Micah B. Schwartz (VSB No. 77299)  
323 2nd Street SE, Suite 700  
Charlottesville, VA 22902  
Telephone: (434) 977-2500  
Facsimile: (434) 980-2222  
jblank@mcguirewoods.com  
mschwartz@mcguirewoods.com

*Counsel for Defendants James B. Murray, Jr., Whittington W. Clement, Robert M. Blue, Mark T. Bowles, L.D. Britt, Frank M. Conner III, Elizabeth M. Cranwell, Thomas A. Depasquale, Barbara J. Fried, John A. Griffin, Louis S. Haddad, Robert D. Hardie, Maurice A. Jones, Babur B. Lateef, Angela Hucles Mangano, C. Evans Poston Jr., James V. Reyes, Peter C. Brunjes, Timothy Longo*



*Sr., Melissa Fielding, John J. Densmore, Jim B. Tucker, Christine Peterson, and Nora Kern*

**CERTIFICATE OF SERVICE**

I hereby certify that on this March 24, 2022, the foregoing document was sent via electronic mail only to the following:

Michael J. Lockerby, Esquire  
mlockerby@foley.com  
*Counsel for Plaintiff*

H. Robert Yates, III, Esquire  
C. Quinn Adams, Esquire  
ryates@ohaganmeyer.com  
cadams@ohaganmeyer.com  
*Counsel for Defendant Dr. Sara Rasmussen*

/s/ Farnaz F. Thompson  
Farnaz F. Thompson